

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:	:	CHAPTER 7
	:	
CASSANDRA JOHNSON LANDRY	:	CASE NO. 18-55697-LRC
	:	
Debtor.	:	

**RESPONSE TO DEBTOR'S MOTION FOR REQUEST FOR TRUSTEE REPORT**

COMES NOW S. Gregory Hays, Trustee, and responds to each numbered item in Debtor's Motion as follows:

- 1) Efforts taken regarding reported Mortgage Fraud for Real Properties PRIOR TO ABANDONMENT.**
- 2) Efforts taken regarding Commercial Mortgage and Wire Fraud regarding Commercial Properties PRIOR to Life of Stay. Which led to Foreclosure, Sale or other.**

In connection with above two issues, the trustee requested documents regarding this matter in November and December, 2018 [See Document #122]. The Trustee requested the information again by email on January 23, 2019. No documents were produced that provide any indication of mortgage fraud and no claim was scheduled by the Debtor.

In an email to Debtor dated January 23, 2019 the Trustee stated as follows:

"Provide a complete package on all three real properties and the mortgages you claim are fraudulent. In your testimony on 1/22/2019 you claimed all the mortgages were fraudulent. Please provide copies of all documents you claim are fraudulent."

The Debtor has not produced any clear documents and no claims were scheduled or exempted by the Debtor.

**3) Money obtained from Personal Injury Case on 11.29.16 involving Willie Gary Firm.**

The Trustee requested information from the Debtor on this alleged claim in November and December 2018 [See Docket #122]. Willie Gary declined to represent the Debtor in 2018 after the Debtor did not provide documents requested to substantiate the Debtor's claim.

The Trustee again requested information by email on January 23, 2019 as follows:

*"Pursuant to Docket #1 on page 15 filed on 4/3/18 you indicate you had three automobile accidents and stated you would provide detail on those claims. You testified there were only two automobile accidents. Amended your schedules to identify the two automobile accident claims and the value you place on those claims. **Provide the name of any lawyer you have employed to pursue those automobile claims and copies of the police reports and other information you may have documenting your claim.**"*

The Debtor has not produced any clear documents and no claim was scheduled or exempted by the Debtor.

**4) Money obtained from Family and Children Services owed to Petitioner.**

The Trustee requested the information from the Debtor in November and December 2018 [See Docket #122].

The trustee again requested information on January 23, 2019 in an email that stated:

*"You testified at the 341 meeting that Family and Children Services owed you \$2 million. You did not schedule that claim and must amend the schedules. **Provide any document you have on this claim and amend your schedules to identify your claims against the Department of Family and Children's Services.**"*

The Debtor has not produced any clear documents and no claim was scheduled or exempted by the Debtor.

**5) Investigation of Modified Transcripts for DHR Administrative Services which caused Petitioner to loose case which led to the non-filing of 30 million dollar lawsuit by Dorian Murry Esq who represented agency**

The Trustee requested information from the Debtor in November and December 2018 [See Docket #122].

The trustee again requested information on January 23, 2019 in an email that stated:

“You testified at 341 meeting that Department of Behavioral Health and Developmental Disabilities owed you \$30 million. You did not schedule that claim and must amend the schedules. ***Provide any documents you have and amend your schedules to identify your claims against Department of Behavioral Health and Developmental Disabilities.***”

The Debtor has not produced any clear documents and no claim was scheduled or exempted by the Debtor.

**6) All money paid to Creditors and Names of Creditors.**

The Trustee has no funds in the estate and has paid no money to creditors.

**7) Investigation of Disputed and False Claims.**

The Trustee requested information on Creditors from the Debtor in November and December 2018 [See Docket #122].

The trustee again requested information by email dated January 23, 2019 as follows:

“In your 341 meeting in the Chapter 13 case you testified that you disputed most all of the claims of creditors and indicated you planned to file objections. The Chapter 13 trustee stated: “Debtor disputes each and every claim filed in this case, and intends to seek disallowance, in full or in part, of each claim. Debtor has not taken appropriate action to do so.” “Debtor may not have enough debt to warrant a reorganization. Without a bankruptcy purpose, it may be inappropriate for Debtor to seek bankruptcy protection” 11 USC 1325(a)(7). You indicated at the 341 meeting on November 28 that you still disputed all claims. ***Provide an updated schedule of all claims and the claims you dispute and amend your schedules as appropriate.***”

The Debtor has not produced any clear documents regarding disputed claims and no amended claim schedules have been filed. There are no funds in the estate at this date and therefore no claims analysis has been undertaken.

Attached to this Response is a current copy of Form 1 prepared by the Trustee.

This 5<sup>th</sup> day of December, 2019.

/s/ S. Gregory Hays  
S. Gregory Hays  
Chapter 7 Trustee

Hays Financial Consulting, LLC  
2964 Peachtree Road, NW  
Suite 555  
Atlanta, GA 30305  
(404) 926-0060

# Form 1

## Individual Estate Property Record and Report

### Asset Cases

Page: 1

Case No.: 18-55697-LRC

Case Name: LANDRY, CASSANDRA JOHNSON

Trustee Name: (300320) S. Gregory Hays

Date Filed (f) or Converted (c): 09/14/2018 (c)

§ 341(a) Meeting Date: 11/27/2018

For Period Ending: 12/04/2019

Claims Bar Date: 05/20/2019

1 Ref. #	Asset Description (Scheduled And Unscheduled (u) Property)	2 Petition/ Unscheduled Values	3 Estimated Net Value (Value Determined By Trustee, Less Liens, Exemptions, and Other Costs)	4 Property Formally Abandoned OA=§554(a) abandon.	5 Sale/Funds Received by the Estate	6 Asset Fully Administered (FA)/ Gross Value of Remaining Assets
1	2969 Sweetbriar Walk, Snellville, GA 30039, Gwinnett County One-half interest. Entire property value: \$179,500. Abandoned per Notice, Docket # 155.	89,750.00	0.00	OA	0.00	FA
2	1440 Highland Lake Dr, Lawrenceville, GA 30045, Gwinnett County One-half interest. Entire property value: \$313,500. Abandoned per Notice, Docket # 155.	156,750.00	0.00	OA	0.00	FA
3	669 Natchez Valley Trace, Grayson, GA 30017, Gwinnett County One-half interest. Entire property value: \$444,600. Abandoned per Notice, Docket # 155.	222,300.00	0.00	OA	0.00	FA
4	2001 Merce 500CL Abandoned per Notice, Docket # 155.	20,000.00	627.83	OA	0.00	FA
5	Major Appliances, furniture, linens, china, and kitchenware	8,500.00	7,500.00		0.00	8,500.00
6	radios, computer, printers, cellphone, media player	3,500.00	3,200.00		0.00	3,500.00
7	Artwork	5,000.00	4,850.00		0.00	5,000.00
8	Pistol and ammunition Abandoned per Notice, Docket # 155.	450.00	450.00	OA	0.00	FA
9	Everyday clothes, furs, leather coats, designer wear, shoes, and accessories	10,000.00	9,500.00		0.00	10,000.00
10	Everyday jewelry, costume jewelry, engagement ring, wedding ring,	15,000.00	14,900.00		0.00	15,000.00
11	Dog Shih-Tzu Abandoned per Notice, Docket # 155.	1,000.00	1,000.00	OA	0.00	FA
12	Cash	150.00	0.00		0.00	FA
13	Checking account: Publix Credit Union	200.00	0.00		0.00	FA
14	Savings account: Publix Credit Union	200.00	0.00		0.00	FA
15	Alliance For Change Through Treatment, 95% ownership Abandoned per Notice, Docket # 155.	500,000.00	0.00	OA	0.00	FA
16	Attachment and Bonding Ctr of Atlanta, 95% ownership Abandoned per Notice, Docket # 155.	100,000.00	0.00	OA	0.00	FA
17	Therapeutic Essentials, 0% ownership Abandoned per Notice, Docket # 155.	25,000.00	0.00	OA	0.00	FA
18	Licensed Professional Counselor Abandoned per Notice, Docket # 155.	150.00	0.00	OA	0.00	FA
19	2016 State of Georgia already filed: State	769.00	769.00		0.00	FA

# Form 1

## Individual Estate Property Record and Report

### Asset Cases

Page: 2

Case No.: 18-55697-LRC

Case Name: LANDRY, CASSANDRA JOHNSON

Trustee Name: (300320) S. Gregory Hays

Date Filed (f) or Converted (c): 09/14/2018 (c)

§ 341(a) Meeting Date: 11/27/2018

For Period Ending: 12/04/2019

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1 Asset Description (Scheduled And Unscheduled (u) Property)	2 Petition/ Unscheduled Values	3 Estimated Net Value (Value Determined By Trustee, Less Liens, Exemptions, and Other Costs)	4 Property Formally Abandoned OA=§554(a) abandon.	5 Sale/Funds Received by the Estate	6 Asset Fully Administered (FA)/ Gross Value of Remaining Assets
Ref. #					
20*	Insurance Policy: Farmers New World: Beneficiary: Ivy T Landry (See Footnote)	75,000.00	75,000.00	0.00	FA
21*	Insurance Policy: Northwestern Mutual: Beneficiary Ivy T Landry (See Footnote)	100,000.00	100,000.00	0.00	34,758.15
22*	Northwestern Mutual - Variable Annuity (See Footnote)	100,000.00	100,000.00	0.00	85,913.65
23	ADVERSARY PROCEEDING NO. 19- 5218-LRC. Cassandra Johnson Landry V. H&R BLOCK MORTGAGE LLC, MORTGAGE ELECTRONIC SYSTEMS, OPTION ONE MORTGAGE, OCWEN LOAN, SERVICING, LLC, PHH MORTGAGE SERVICES, DEUTSCHE BANK NATIONALTRUST COMPANY (u)	85,000,000.00	0.00	OA	FA
24	3 auto accident claims (u)	Unknown	0.00	OA	FA
25	Potential Claim against Family and Children Services (u)	Unknown	0.00	OA	FA
26	Potential Claim for investigation of Modified Transcripts for DHR Administrative Services which caused Petitioner to loose case which led to the non-filing of \$30 million dollar lawsuit by Dorian Murry Esq who represented agency. (u)	Unknown	0.00	OA	FA
26	Assets Totals (Excluding unknown values)	\$86,433,719.00	\$317,796.83	\$0.00	\$162,671.80

RE PROP# 20 Trustee filed an objection to Debtor's claimed exemption of \$75k. Per letter from Farmers New World, policy is no longer in force and has no net cash value.

RE PROP# 21 Trustee filed an objection to Debtor's claimed exemption of \$100k. Trustee is investigating ownership. Current value represents CSV.

RE PROP# 22 Trustee filed an objection to Debtor's claimed exemption of \$100k. Trustee is investigating ownership. Current value is \$85,913.65.

#### Major Activities Affecting Case Closing:

The case was originally filed as a Chapter 13 case on 4/3/18. It was converted to Chapter 7 on 9/14/18. The two previous Chapter 7 Trustees rejected their appointment. Trustee was appointed on 10/24/18.

The Trustee is investigating ownership interest in an annuity and insurance policy. Trustee to file motion to turnover value of Northwestern Mutual policy and set a hearing on objection to exemptions relating to same.

Initial Projected Date Of Final Report (TFR): 06/30/2021

Current Projected Date Of Final Report (TFR): 06/30/2021

CERTIFICATE OF SERVICE

This is to certify that I have this date served a true and correct copy of the foregoing **Response to Debtor's Motion for Request for Trustee Report** upon the parties listed below via the Court's ECF system or by U.S. Mail at the addresses stated:

R. Jeneane Treace  
Office of the United States Trustee  
362 Richard Russell Building  
75 Ted Turner Drive, SW  
Atlanta, GA 30303

Cassandra Johnson Landry  
P.O. Box 1275  
Grayson, GA 30017

Dated this 5th day of December, 2019.

Isl S. Gregory Hays  
Chapter 7 Trustee

2964 Peachtree Road NW, Suite 555  
Atlanta, Georgia 30305  
Telephone: (404) 926-0060